

## STATUS OF IMPLEMENTATION – AUDIT SERVICES DIVISION REPORT RECOMMENDATIONS

**Audit Report Title:** Pulling Back the Curtain: A Look at Milwaukee County’s Workforce Through Racial and Gender Equity Lenses from 2009 - 2019

**File Number:** 20-205  
**Status Report Date:** December 2022

**Audit Issued:** February 2020  
**Department:** Human Resources

### Open Recommendations

<b>Recommendation #1</b>	
<b>Recommendation - February 2020</b>	
Work with County agencies that are outliers in both directions for both racial groups and gender to formulate a plan to diversify their staffing.	
<b>Deadlines Established Y/N?</b> No	
Date	Management Comments:
<p style="background-color: yellow;">Current - December 2022</p>	<p style="background-color: yellow;"><b>DHR Pending:</b></p> <p>Talent Acquisition Diverse Recruiting Strategy increased Diverse NEW Hires for 2022-YTD by 82%. In 2022 YTD there has been 1,485 Diverse New Hires.</p> <p>Attended and hosted 47 community events and hiring events YTD for 2022.</p> <p>Increased diverse applicant flow for the following areas American Indian – 19%, Asian – 29% and Hispanic 8%.</p> <p>Sponsored Diverse Community events including: Pridefest, Mexican Fiesta, Puerto Rican Festival, UMOs Cerveceros, and Hmong Chamber of Commerce Business Awards.</p> <p>Social Media strategy has increased applicant flow of diverse applicants in the targeted areas of Hispanic, Asian and Indigenous groups. Attending events and joining specific Diverse groups such as Asian Young Professionals of Milwaukee, Indians in Wisconsin, Indian/Desi Community in Milwaukee, Latinos in Milwaukee, Latinos Connect Milwaukee, Indian in and around Milwaukee and Puerto Rican Flags up on Facebook and in the community has helped us increase the applicant flow. Interview guides were created for Zoo and Parks during the hiring events. Revised CRC interview guides for Hiring events.</p>
June 2022	<p>Diversity Recruiter was hired to assist with diversifying the talent pool. TA Team has identified sourcing strategies to attract more diverse candidates for leadership roles. The focus for 2022 will be to increase applicant pool in the following areas: Hispanic, Asian and Indigenous. The TA Team has hosted several hiring events with the county.</p> <p><b>Audit Services Division Comments:</b>  <i>Progress toward the foundational aspects of staffing diversification is acknowledged. The next phase should include the formulation of specific plans for outlier agencies.</i></p>
December 2021	<p>TA Team is networking and socializing by joining diverse groups and on social platforms to help reduce the recruitment spend of paid job boards and create diverse talent pipelines. TA leadership will focus for the remainder of 2021 and into 2022 on employer branding, leading a workgroup from the CEX office and across all County agencies to implement our Employer Identity that encompasses our Mission-Vision-Values. As with a strong employer brand it will increase our applicants-per-opening rate, and also improves the quality of our talent pool. The career page was enhanced to create a better candidate experience with the launch of the new Dayforce ATS which has also strengthened our employer brand. All metrics and</p>

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	tracking of impact will be calculated and the end of 1 <sup>st</sup> Qtr. 2022, then each Qtr. End throughout the year.
June 2021	Currently working on strengthening our employee brand with social media thru diverse channels and community partners. Analyzed the demographics of each department and creating a strategy plan based on the data to be completed by end of third Quarter. Hired a new Talent Acquisition Manager (TAM) May 2021 who along with the Director, will meet with each dept./agency to formalize strategy, document plans and continuously update those plans on an ongoing basis.
December 2020	We have worked with our vendor to identify close to 200 community partners to post positions. These diverse organizations will aid in ensuring that job postings are reaching diverse populations. A meeting will be planned for the 1 <sup>st</sup> quarter 2021 to work on a plan to best align these community organizations to job postings.
Audit response – February 2020	Auditee: In the first quarter of 2020, the talent acquisition team calculated the percentage of diverse employees in each department to identify current diversity. After calculating each number, we identified departments with a total percentage of diversity that was less than 20%. In the second quarter, recruiting challenges and opportunities for each department were reviewed. A targeted recruitment strategy will be developed for each department to help increase the diversity of the applicant pools by 3% for leadership (cabinet), Managers/supervisors (people leaders) and classified and support staff positions inclusive of all agencies.

<b>Recommendation #2</b>	
<b>Recommendation - February 2020</b>	
Set up a system to regularly monitor the variance in salaries by race and analyze the data to determine the cause. Once cause has been determined, establish appropriate steps to eliminate the variance and report actions to County leadership and policymakers.	
<b>Deadlines Established Y/N?</b>	No
<b>Date</b>	<b>Management Comments:</b>
Current – December 2022	<b>DHR Pending:</b> Implementation of the Compensation Module has been further delayed given other ERP commitments and the resources required to manage this implementation. HR has hired a Data Analytics Coordinator in 2022 and she will be included in the development of reporting capabilities with the new module as well as with the current suite of modules to enhance visibility in this area.
June 2022	Regular system reporting capabilities are still in development with respect to internal equity. The Compensation module of Dayforce is still on track for 2022 implementation. As the Compensation module’s capabilities are determined, a re-emphasis on general reporting will occur if necessary.



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December 2021	Diversity & Inclusion AMOP was submitted for final approval to AMOP Committee and was approved on August 12, 2021.
June 2021	The Diversity & Inclusion AMOP Peer Review completed. AMOP will be submitted for final approval to AMOP Committee in July 2021. New D&I Program Manager started May 2021. He is presently reviewing and will determine next steps, if needed.
December 2020	The Diversity & Inclusion AMOP has been revised and is currently in Peer Review.
Audit response – February 2020	The HR Analyst has been working directly with the DHR D&I Program Manager to facilitate the revision of the EEO and Diversity and Inclusion AMOP. The DHR D&I Program Manager completed revisions to the EEO AMOP. The new EEO AMOP was then peer reviewed by representatives from DHR-Employee Relations, the Office of African American Affairs and the Office of People with Disabilities. The EEO AMOP is currently being considered by the Milwaukee County Review Board. The DHR D&I Program Manager is also revising the Diversity & Inclusion AMOP to align to both the new County Strategic Plan and the Diversity and Inclusion Strategic plan. This is expected to be completed by December 31, 2020.

<b>Recommendation #5</b>	
<b>Recommendation – February 2020</b>	
Work to establish a toolkit for recruiting and hiring a diverse workforce to provide specific guidelines and train hiring managers on how to hire a diverse staff.	
<b>Deadlines Established Y/N?</b> Yes	
<b>Date</b>	<b>Management Comments:</b>
Current - December 2022	<b>DHR Pending:</b> Talent Acquisition has updated the toolkit to include diverse strategies for hiring manager which include auditing job announcements, target sources where diverse candidates congregate, encourage diverse employees to refer openings, offer internships to targeted groups, rethink the factors that you screen for and using blind resumes. In August of 2022 we piloted our first interview training and will deliver for 2023 the interview training across Milwaukee County.
June 2022	Talent Acquisition is updating the toolkit to include diverse strategies for hiring manager. In August of 2022 will be offering interview training focused on unconscious bias. Social Media strategy has been implemented and targeted based on Hispanic, Asian and Indigenous groups.
December 2021	Interview training and interview guides will be ready for role out in 2022. Dayforce ATS system was launched throughout the County. Diversity Recruiter was approved for 2022 budget. Social media, marketing and diversity recruiting plans are being developed to launch in 2022. TA team will broaden and analyze data to understand the Community and the market for quarter 4 to increase diversity in candidates.
June 2021	Currently working with L&D to create interview training and interview guides for leaders in the new platform by the end of third quarter. Tool kit will be updated with social media strategies and interview guides in the new platform by the end of third quarter. Hired a new



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	<p>question, or we receive an email informing us the report has been file with no issues. We receive a copy of the report two to three months later. Due to COVID, the reports have been pushed back to January, however, in prior years we had to file by October. Once we receive the completed report, the Director of Benefits provides a copy of the Completed EEO4 response report from the Federal Government to the Grants Department and the Audit Department.</p> <p><b><u>Audit Services Division Comments:</u></b>  <i>Although the process outlined above may currently be followed by County areas involved, we continue to see a benefit to having the process formally documented as committed to by DHR leadership in its management response to the recommendation. This can be essential with multi-department involvement and instances of staff turnover.</i></p>
December 2021	<p>DHR reviewed the technology platform report capabilities which changed for 2020 and updated our procedures and guidelines to match the Federal EEO Guidelines. We used these new guidelines to make our report. It was submitted and no issues were reported. Ongoing, we will review the Federal Guidelines prior to completing the report to ensure we remain in compliance biannually. The next EEO4 report is due on January 4th, 2022. The Department of Human Resources will share the results with the County's Grant Department once they are received.</p> <p><b><u>Audit Services Division Comment:</u></b>  <i>We are seeking written documentation of the process for the production, publication, and retention of the biennial EEOC report.</i></p>
June 2021	<p>This action item should not be directed at DHR and will be omitted from this report. This EEOC report referenced here was created and is a work product of the Grants Department.</p> <p><b><u>Audit Services Division Comment:</u></b>  <i>This item is held open pending confirmation that the thrust of this recommendation is understood following the transfer of these responsibilities to the Department of Administrative Services - Grants &amp; Special Projects Unit.</i></p>
December 2020	<p>DHR reviewed the technology platform report capabilities which changed for 2020 and updated our procedures and guidelines to match the Federal EEO Guidelines. We used these new guidelines to make our report. It was submitted and no issues were reported. Ongoing, we will review the Federal Guidelines prior to completing the report to ensure we remain in compliance biannually.</p>
Audit response – February 2020	<p>DHR is reviewing the technology platform report capabilities and is considering creation of an AMOP for completing and retaining the biennial EEOC report.</p>

### Newly Closed Recommendations

None

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### Closed Recommendations

<b>Recommendation #4</b>	
<b>Recommendation - February 2020</b>	
Conduct a review of all involuntary separations to determine if there is a reason for the disproportionate number of Black or African American employees or other racial groups. Devise a plan to work with managers to combat this trend.	
<b>Deadlines Established Y/N?</b> No	
Date	Management Comments:
June 2022	DHR Employee Relations continue to capture separation reasons by utilizing termination codes implemented in August 2021. We are exploring a process for sharing this information with department leaders for their awareness and consideration for continuous improvement opportunities.
December 2021	<p>The new termination reason codes were implemented on August 1, 2021. During the period beginning August 1, 2021 through December 1, 2021 there were 21 involuntary terminations. Of the 21 involuntary terminations, 12 were Black or African American; 6 decline to provide ethnicity information; 2 were White (not Hispanic or Latino) and 1 was Hispanic or Latino.</p> <p>9 – Failure of Probationary Period                      6 – Policy Rule Violation                      2 – Performance                      2 – Failed Testing during Training                      1 – Non-Disciplinary                      1 – Attendance</p> <p><b><u>Audit Services Division Comment:</u></b>  <i>We continue to see significant progress toward formalization of the process.</i></p>
June 2021	<p><b><i>See Appendix, Item #4 below.</i></b></p> <p>We have created new termination codes to provide specificity and greater clarity on the reason(s) employees exit (voluntary and involuntary) Milwaukee County. We expect to begin using the new codes on or about August 1st, 2021.</p>
December 2020	2020 Q1 and Q2 data was received and upon initial review of involuntary separations from the County, there appears to be a disproportionate number of African Americans employees and other racial groups that are involuntarily separated. A meeting will be scheduled in the fourth quarter of 2020, with members of the DHR leadership team to further review the data and develop a plan to combat this trend.
Audit response – February 2020	DHR will generate a report by September 30, with Q1 and 2 data and review. After reviewing, the Employee Relations team in collaboration with the DHR leadership team, will determine plan of action.

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<b>Recommendation #7</b>	
<b>Recommendation - February 2020</b>	
Evaluate whether manager diversity performance should be added to the annual performance evaluation process.	
<b>Deadlines Established Y/N?</b>	
Yes	
<b>Date</b>	<b>Management Comments</b>
June 2022	<p>The transition to the Dayforce Performance Management platform continues and will be fully deployed before the end of 2022. This technology will provide numerous benefits among them automating the process and providing the ability of leaders at all levels to implement diversity and inclusion goals, and other goals in alignment with County strategy. The goals module was deployed in March, and probationary reviews will be deployed in June. The annual review process module will be deployed in the fall.</p> <p>In addition, Milwaukee County is implementing an updated list of Core Competencies applicable to all employees. The performance of all employees receiving a probationary or annual review will be assessed against these six competencies. A competency related to diversity has been added to all performance evaluations. The diversity related competency is titled “Values Differences”. It helps drive the expectation that all employees, including leaders, recognize the value that different perspectives and cultures bring to Milwaukee County. County employees should also seek to understand different perspectives and cultures while contributing to a work climate where differences are valued and supported.</p> <p>In summary, the deployment of the Dayforce performance management technology greatly enhances Milwaukee County’s ability to implement diversity related goals and competencies at all levels, improving the County’s ability to achieve its diversity and inclusion objectives and other key strategies.</p>
December 2021	<p>Significant changes to the performance management process are delayed due to the ongoing impact of the COVID-19 pandemic. A cross functional team is in the process of transitioning the current paper-based process to Dayforce, but any changes to the process are based on the requirements of the Dayforce technology. With significant resources needed to successfully launch the Dayforce platform in Q1, significant changes to the process will begin to be considered in Q2 2022, including reviewing the current process through a D&amp;I lens, as well as other improvements and enhancements.</p>
June 2021	<p>New D&amp;I Program Manager started May 2021. He is presently reviewing all data and findings from earlier research and will determine next steps. Preparing for Phase 3 of Dayforce implementation of Dayforce platform for Performance Management.</p> <p><b><u>Audit Services Comment:</u></b>  <i>If not completed, the targeted implementation timeline should be communicated with the next status report update.</i></p>

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December 2020	Special Note, implementation of performance changes has been postponed due to the impact of COVID-19.
Audit response – February 2020	The DHR Program Manager for Performance Management and Diversity and Inclusion met with management team across Milwaukee County during the 1 <sup>st</sup> quarter of 2020. She captured input, data and feedback to assist in the redesign of the Performance Management Review process at Milwaukee County. During the 2 <sup>nd</sup> quarter of the year a new Performance Evaluation form was created that included the Values and Objectives of Milwaukee County Strategic Plan. These included the following behaviors; Integrity, Respect, Excellence and Diversity & Inclusion. After the transition of the County Executive Performance Evaluation form was adjusted to reflect the new Milwaukee County Values; Inclusion, Influence and Integrity. The Performance Evaluation form has been shared within HR and is scheduled to be delivered to the organization beginning November 2020 for use for managing performance from January 1, 2020 through December 31, 2021.

<b>Recommendation #8</b>	
<b>Recommendation - February 2020</b>	
Update, publish and present County workforce data to policymakers annually.	
<b>Deadlines Established Y/N?</b>	No
<b>Date</b>	<b>Management Comments:</b>
June 2022	Workforce Data is now published live to general public via the Strategy Dashboard on the Milwaukee County website. This data consists of race, gender, tenure length, separations, and racial and gender demographics of leadership.
December 2021	The current Dayforce implementation was slower than expected. The Department of Human Resources (DHR) will begin reviewing and reporting on diversity and inclusion workforce data by Q2 2022, given the completion of the full system implementation. DHR continue to meet with IMSD staff to review system configuration and to determine the best way to capture this information and ensure workforce data integrity.
June 2021	DHR will address reporting feature capabilities and build out post completion of Phase 2, targeted for August 2021. DHR will develop a report to share workforce data on a monthly basis as a standing item that is presented to the personnel committee and full board. This report will be public as it will be a board item. Annually the DHR will publish an annual diversity and inclusion report to be included as part of the HR budget narrative starting with the FY21 budget process.
December 2020	Dayforce transition is on track – reporting capabilities with respect to this objective will be vetted in the new system after go-live beginning December 27, 2020.
Audit response – February 2020	Annually the department of human resources will publish an annual diversity and inclusion report to be included as part of the HR budget narrative starting with the FY21 budget process.

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### APPENDIX, ITEM #4

After review of the data available of **involuntary separations** from Milwaukee County from January 2, 2020 to September 30, 2020, there was a disproportionate number of African Americans employees and other racial groups that were involuntarily terminated.

- Total involuntary separations- 56 employees
- Significant percentage of employees separated during probation- 88%
- There is disparity among African American employees and other racial groups involuntarily separated
  - African American & other racial groups- 88%
  - African Americans- 68%
  - White- 13%
- Majority involuntarily separated are in entry level positions
  - Correctional Officers & Public Safety employees- 59% African American and other racial groups
    - 72% African American
  - Termination reasons during probation included:
    - Policy/Rules Violation 14
    - Attendance Related 8
    - LESB/ FTO /Required Training 7 (LESB 12-16 weeks)
    - Job Performance 4

In reviewing the data, it was identified that we need better termination codes to indicate why employees were involuntarily separated from the County, including the reason for the termination, e.g. performance, attendance, policy violation, etc. There are employees who charges are filed to terminate their employment and they resign before their hearing is held. Those are noted in our HRIS as "resigned".

As a result of this discovery, HR will work in collaboration with Payroll, OCC and RPS to ensure termination codes are reviewed and created taking into consideration any applicable Ordinances/Resolutions, payout requirements or impact to pension payments to ensure proper procedures are followed.

In reviewing public safety closer given it was the largest number of involuntary separations during probationary period.

The action DHR will take to begin to close or eliminate the disproportionate number of African Americans employees and other racial groups that are involuntarily terminated, is to partner with department leaders and collaborate with other appropriate Departments to implement the following actions.

- There are a multitude of policies, Milwaukee County Ordinances, Work Rules, Administrative Orders, etc. that employees are required to be familiar with upon beginning their employment with Milwaukee County and to ensure their success, it is recommended that departments have scheduled sessions to review policies and work rules, etc. and ensure the employee has a good understanding of what is expected of them.
- It is important to ensure HR BPs are engaged in Internal Affairs or Corrective Action discussions and decisions to provide a racial equity lens and ensure all necessary support, resources, and discussions were had with employees to offer them a successful employment experience with Milwaukee County.
- Offer onboarding survey and review data regularly or conduct check-in's with new employees to begin discussions early on in their career with Milwaukee County to address their questions and to build

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effective relationships with their leader and HR. This includes regular leader 1:1's with their employees. This will allow for 1:1 discussion and may allow a more inviting environment for questions and clarifications. Identify what the specific needs are for each employee.